

Message

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**From:** Knorr, Michele [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5E2165E5C2224BAC8D33C2F857C33886-MKNORR]  
**Sent:** 10/29/2020 6:06:39 PM  
**To:** Koch, Erin [Koch.Erin@epa.gov]  
**CC:** Garrison, Scott [Garrison.Scott@epa.gov]  
**Subject:** Re: 24(c) thoughts for Friday

Great. I think we are in good shape for the meeting. Hopefully, Rick will provide us with guidance.

Michele Knorr  
OGC  
202-564-5631

On Oct 29, 2020, at 2:00 PM, Koch, Erin <Koch.Erin@epa.gov> wrote:

## Ex. 5 Attorney Client (AC)

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**From:** Knorr, Michele <knorr.michele@epa.gov>  
**Sent:** Thursday, October 29, 2020 12:03 PM  
**To:** Koch, Erin <Koch.Erin@epa.gov>; Garrison, Scott <Garrison.Scott@epa.gov>  
**Subject:** RE: RE: 24(c) thoughts for Friday

## Ex. 5 Attorney Client (AC)

# Ex. 5 Attorney Client (AC)

Michele L. Knorr, Attorney  
Pesticides and Toxic Substances Law Office  
Office of General Counsel  
202-564-5631

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**From:** Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>  
**Sent:** Thursday, October 29, 2020 11:20 AM  
**To:** Knorr, Michele <[knorr.michele@epa.gov](mailto:knorr.michele@epa.gov)>; Garrison, Scott <[Garrison.Scott@epa.gov](mailto:Garrison.Scott@epa.gov)>  
**Subject:** RE: RE: 24(c) thoughts for Friday

# Ex. 5 Deliberative Process (DP)

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**From:** Knorr, Michele <[knorr.michele@epa.gov](mailto:knorr.michele@epa.gov)>  
**Sent:** Thursday, October 29, 2020 9:25 AM  
**To:** Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>; Garrison, Scott <[Garrison.Scott@epa.gov](mailto:Garrison.Scott@epa.gov)>  
**Subject:** FW: RE: 24(c) thoughts for Friday

Just some quick thoughts below.

# Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Special local need is defined under 40 CFR 162.151 as “an existing or imminent pest problem within a State for which the State lead agency, based upon satisfactory supporting information, has determined that an appropriate federally registered pesticide product is not sufficiently available.”

## Ex. 5 Deliberative Process (DP)

<https://www.epa.gov/sites/production/files/2013-08/documents/8570-25.pdf>

Michael L. Goodis, P.E.  
Acting Deputy Director for Programs  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
703-308-8157

-----Original Appointment-----

**From:** Garrison, Scott <[Garrison.Scott@epa.gov](mailto:Garrison.Scott@epa.gov)>

**Sent:** Wednesday, October 28, 2020 9:36 AM

**To:** Garrison, Scott; Cole, Joseph E.; Koch, Erin; Knorr, Michele; Keigwin, Richard; Messina, Edward; Goodis, Michael

**Subject:** RE: 24(c) Web Page

**When:** Friday, October 30, 2020 9:30 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

**Importance:** High

This 15 minute window on Monday is the earliest where everyone on the email except Joe is available. Rick and Ed seem booked solid, Mike and Joe slightly less so.

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ard  
October 28, 2020 9:21 AM  
; Knorr, Michele; Koch, Erin  
; Messina, Edward; Goodis, Michael  
) Web Page

Thanks Scott. Happy to do a quick call with OGC and OPP, if that would help.

**From:** Garrison, Scott <[Garrison.Scott@epa.gov](mailto:Garrison.Scott@epa.gov)>

**Sent:** Wednesday, October 28, 2020 9:16 AM

**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Knorr, Michele <[knorr.michele@epa.gov](mailto:knorr.michele@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>

**Cc:** Cole, Joseph E. <[cole.josephe@epa.gov](mailto:cole.josephe@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Subject:** RE: 24(c) Web Page

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## Ex. 5 Attorney Client (AC)

Scott Garrison

Pesticides and Toxic Substances Law Office (2333A)

Office of General Counsel

U.S. Environmental Protection Agency

202-564-4047

[garrison.scott@epa.gov](mailto:garrison.scott@epa.gov)

**From:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Sent:** Wednesday, October 28, 2020 8:58 AM  
**To:** Garrison, Scott <[Garrison.Scott@epa.gov](mailto:Garrison.Scott@epa.gov)>; Knorr, Michele <[knorr.michele@epa.gov](mailto:knorr.michele@epa.gov)>; Koch, Erin <[Koch.Erin@epa.gov](mailto:Koch.Erin@epa.gov)>  
**Cc:** Cole, Joseph E. <[cole.josephe@epa.gov](mailto:cole.josephe@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** 24(c) Web Page  
**Importance:** High

During my check-in with Alex this morning, she mentioned that she thought we needed to update the FIFRA 24(c) webpage ([https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations#:~:text=Section%2024\(c\)%20states%20that,24\(c\)%20registrations%20annually.](https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations#:~:text=Section%2024(c)%20states%20that,24(c)%20registrations%20annually.)), particularly in light of yesterday's announcement. I've already received a few calls from states – I'm sure others have, as well – about some of the statements made in conjunction with the announcement and how we will operate the 24(c) program moving forward.

OCSPP would appreciate any advice that OGC might have on how to revise/update this language.

For OPP, we probably also need to look at the forms and the guidance documents to see what updates might be needed there (if any).

--Rick

Rick Keigwin

Acting Deputy Assistant Administrator for Management

Office of Chemical Safety and Pollution Prevention

US Environmental Protection Agency

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